

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	<b>CASE NO.:</b> 19-25536-ABA  <b>CHAPTER</b> 13  <b>HEARING DATE:</b> August 30, 2022  <b>JUDGE:</b> Andrew B. Altenburg Jr.
<b>RAS Citron, LLC</b> 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor U.S. Bank Trust National Association, not in its individual capacity but solely as Owner Trustee for VRMTG Asset Trust	
<b>In Re:</b>  <b>Patricia L. Buchhofer, Debtor.</b>	

**RESPONSE TO DEBTOR’S MOTION TO REINSTATE THE AUTOMATIC STAY**

**COMES NOW**, Mortgage Assets Management, LLC ("Secured Creditor"), by and through undersigned counsel, and hereby files its Response to Debtor’s Motion to Reinstate Automatic Stay (the “Motion to Reinstate”) and, in support thereof, states as follows:

1. On August 12, 2019, Debtor filed a Voluntary Chapter pursuant to Chapter 13 of the Bankruptcy Code
2. Secured Creditor holds a security interest in the Debtor’s real property located at 63 Dorset Court Marlton New Jersey 08053 (“Property”) by virtue of a Reverse Mortgage recorded on October 2, 2009 in Book 2105 at Page 892 of the Public Records of Burlington County, NJ.
3. On July 7, 2020, Secured Creditor filed a Motion for Relief from the Automatic Stay as a result of the Debtor’s failure to timely maintain ongoing post-petition payments for taxes, insurance and/or condo dues. At the time the Motion for Relief was filed, the Debtor was delinquent in the amount of \$2,659.77 for the 2019 Taxes.

4. On August 25, 2020, a Consent Order was entered resolving Secured Creditor's Motion for Relief from Stay which was amended by Order entered 9/9/2020.
5. On May 10, 2021 Secured creditor filed a Certification of Default due to the debtor's failure to comply with the the terms of the consent order.
6. On September 2, 2021 a second consent order was entered resolving the certification of default.
7. On February 9, 2022 secured creditor filed a second Certification of Default due to faield or missed payments. An order was entered vacating the automatic stay on May 5, 2022.
8. On August 8, 2022, the Debtor filed a Motion to Reinstate. The Motion to Reinstate alleges that the debtor has the means to cure the delinquency. Furthermore, the Debtor asserts that she believes she is current on payments to the trustee although the trustees ledger shows the debtor to be delinquent in the amount of \$2117.00.
9. Debtor has also failed to maintain the real estate taxes for the the 2nd, 3rd and 4th quarters of 2021 and the 1st, 2nd and 3rd quarters of 2022 totaling \$8137.47, see attached tax report from the Township of Evesham, with interest continually accruing.
10. In addition secured creditor is still owed the sum of \$9,419.04 for sums advanced since the filing of the Bankruptcy Petition. Secured Creditor thus does not see how it's reasonably possible for the Debtor to cure all of the amounts now due.
11. As such, Secured Creditor opposes the Debtor's Motion to Reinstate as it will cause a great injustice to Secured Creditor and prevent Secured Creditor from exercising its legal and equitable remedies against the subject property.
12. Secured Creditor reserves the right to amend and or supplement this response prior to the hearing.

**WHEREFORE,** Secured Creditor respectfully requests entry of an order denying Debtor's Motion to Reinstate the Automatic Stay as to Secured Creditor and all further relief this Court deems just and proper.

**RAS Citron, LLC**  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 973-575-0707  
By: /s/ Harold N. Kaplan  
Harold N. Kaplan, Esquire  
Bar ID: HK0226  
Email: hkaplan@raslg.com

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>RAS Citron, LLC</b> 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor U.S. Bank Trust National Association, not in its individual capacity but solely as Owner Trustee for VRMTG Asset Trust	CASE NO.: 19-25536-ABA  CHAPTER 13  HEARING DATE: August 30, 2022  JUDGE: Andrew B. Altenburg Jr.
<b>In Re:</b>  <b>Patricia L. Buchhofer, Debtor.</b>	

CERTIFICATION OF SERVICE AND PROOF OF MAILING

I, Harold Kaplan , Esq.:

■ represent the movant in the above-captioned matter.

On August 23, 2022, I caused to be sent a copy of the following pleadings and/or documents to the parties listed in the chart below: Response to Debtor's Motion to Reinstate Stay, and this Certification of Service.

I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 8/23/2022

By: /s/ Harold N. Kaplan  
Harold N. Kaplan, Esquire  
Bar ID: HK0226  
Email: hkaplan@raslg.com

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Lee Martin Perlman Lee M. Perlman 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Debtor's Attorney	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Patricia L. Buchhofer 63 Dorset Ct Marlton, NJ 08053	Debtor	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.



<b>Block/Lot/Qual:</b>	51.01 217.	<b>Tax Account Id:</b>	10622
<b>Property Location:</b>	63 DORSET COURT	<b>Property Class:</b>	2 - Residential
<b>Owner Name/Address:</b>	BUCHHOFFER, PATRICIA L 63 DORSET COURT MARLTON, NJ 08053	<b>Land Value:</b>	75,000
		<b>Improvement Value:</b>	108,200
		<b>Exempt Value:</b>	0
		<b>Total Assessed Value:</b>	183,200
		<b>Additional Lots:</b>	None
<b>Special Taxing Districts:</b>	FIRE DIST. #1	<b>Deductions:</b>	DIS: 250.00

**This Property is in Bankruptcy | Balance Includes any Adjustments to Your Account**

**Taxes**

- Make a Payment
- View Tax Rates
- View Current Bill
- Project Interest

Year	Due Date	Type	Orig Billed	Adj Billed	Balance	Interest	Total Due	Status
2023	02/01/2023	Tax	1,343.11	0.00	1,343.11	0.00	1,343.11	OPEN
2023	05/01/2023	Tax	1,343.10	0.00	1,343.10	0.00	1,343.10	OPEN
<b>Total 2023</b>			<b>2,686.21</b>	<b>0.00</b>	<b>2,686.21</b>	<b>0.00</b>	<b>2,686.21</b>	
2022	02/01/2022	Tax	1,310.13	0.00	1,310.13	132.32	1,442.45	OPEN
2022	05/01/2022	Tax	1,310.12	-548.77	761.35	42.64	803.99	OPEN
2022	08/01/2022	Tax	1,380.66	0.00	1,380.66	15.19	1,395.85	OPEN
2022	11/01/2022	Tax	1,371.50	0.00	1,371.50	0.00	1,371.50	OPEN
<b>Total 2022</b>			<b>5,372.41</b>	<b>-548.77</b>	<b>4,823.64</b>	<b>190.15</b>	<b>5,013.79</b>	
2021	02/01/2021	Tax	1,292.27	0.00	0.00	0.00	0.00	PAID
2021	05/01/2021	Tax	1,292.26	0.00	1,281.41	134.41	1,415.82	OPEN
2021	08/01/2021	Tax	1,328.91	0.00	1,328.91	230.63	1,559.54	OPEN
2021	11/01/2021	Tax	1,327.06	0.00	1,327.06	193.75	1,520.81	OPEN
<b>Total 2021</b>			<b>5,240.50</b>	<b>0.00</b>	<b>3,937.38</b>	<b>558.79</b>	<b>4,496.17</b>	

Last Payment: 03/25/21

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